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Attorneys for All Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KAREN SUTHERLAND, et al.

Plaintiffs,
vs.

CITY OF STOCKTON, et al.

Defendants.

Case No.: 2:21-cv-01855-WBS-AC

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONDUCT THE
DEPOSITIONS OF KAREN
SUTHERLAND, MARTIN L.
CHENEVERT, M.D., AND DANIEL
WOHLGELERNTER, M.D. BY
REMOTE MEANS**

All parties, through their undersigned counsel of record, stipulate as follows:

RECITALS

A. Federal Rule of Civil Procedure 30(b)(4) states parties may stipulate a deposition be taken by remote means.

B. Local Rule 143(a)(1) states stipulations shall be in writing, signed by all attorneys, and filed.

STIPULATION

1. The parties, by and through their undersigned counsel, agree the following depositions may be conducted by remote means:

Deponent	Date	Time	Remote Platform
Karen Sutherland	February 16, 2024	9:00 A.M.	Zoom
Martin L. Chenevert, M.D.	February 23, 2024	10:00 A.M.	Zoom
Daniel Wohlgelernter, M.D.	March 11, 2024	3:00 P.M.	Zoom

2. Plaintiffs will produce the deponents at the dates and times specified and through Zoom.

Dated: January 4, 2024

HERUM CRABTREE SUNTAG, LLP

By: /s/ Joshua J. Stevens
DANA A. SUNTAG
JOSHUA J. STEVENS
Attorneys for all Defendants

Dated: January 4, 2024

V. JAMES DESIMONE LAW

By: /s/ V. James DeSimone
V. JAMES DESIMONE
JENICA P. LEONARD
Attorneys for all Plaintiffs

PROPOSED ORDER

The Court, having considered the stipulation, and finding good cause, rules as follows:

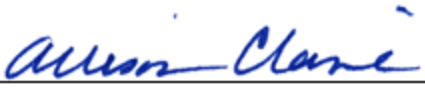
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2. Plaintiffs shall produce the deponents at the dates and times specified and through Zoom.

IT IS SO ORDERED.

Dated: January 4, 2024


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE